



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

August 26, 2019

BW Metals, LLC
c/o William E. Wolf, Manager
900 North Michigan Ave., Suite 1600
Chicago, IL 60611

Re: **Request for Information** Pursuant to Section 104 of CERCLA
Liberty Street Ansonia Copper & Brass Site, Ansonia, CT

Dear Mr. Wolf:

This letter seeks your cooperation in providing information and documents relating to environmental conditions at, and cleanup of, the Liberty Street Ansonia Copper & Brass Site located in Ansonia, Connecticut (the "Site") which is further described in Attachment 1.

The United States Environmental Protection Agency ("EPA") conducted a removal action at the Site and is continuing its investigation into the release or threatened release of hazardous substances, pollutants and contaminants at the Site. This investigation has included an inquiry into the identification, nature, source and quantity of materials transported to or generated, treated, stored or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to finance that cleanup.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosures to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within **thirty (30) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to fifty-seven thousand three hundred seventeen dollars (\$57,317) for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 *et seq.*

Your response to this Information Request should be mailed to:

Tina Hennessy, Enforcement Coordinator
U.S. Environmental Protection Agency
Office of Site Remediation & Restoration
5 Post Office Square, Suite 100 (02-2)
Boston, MA 02109-3912

If you have general questions concerning the Site or this Information Request, please contact Tina Hennessy at (617) 918-1216. If you have any legal questions, please contact Eve Vaudo, Senior Enforcement Counsel, U.S. Environmental Protection Agency – New England, 5 Post Office Square, Suite 100 (04-4), Boston, MA 02109-3912, or at (617) 918-1089.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'EDB', followed by a long horizontal line extending to the right.

Edward J. Bazen, Chief
Emergency Response & Removal Section I

Enclosures

cc: Tina Hennessy, EPA Enforcement Coordinator
Eve Vaudo, EPA Senior Enforcement Counsel

ENCLOSURE A

INFORMATION REQUEST FOR BW METALS, LLC
LIBERTY STREET ANSONIA COPPER & BRASS SUPERFUND SITE
ANSONIA, CONNECTICUT

Period Being Investigated: January 1, 2012 to the Present

In addition to the questions which follow, this enclosure includes a declaration, a site description, detailed instructions for responding to this request, and definitions of words such as "Respondent," "identify," and "waste" used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- Complete the enclosed declaration.
- For each question, identify all persons and documents relied upon in the preparation of the answer.
- All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.
- This request imposes a **continuing obligation** upon you to submit responsive information discovered after your original response is submitted to EPA.

1. Information Request Questions

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. Provide the full legal name, mailing address, and email address of Respondent.
- b. For each person answering these questions on behalf of Respondent, provide:
 - i. full name;
 - ii. title;
 - iii. business address; and
 - iv. business telephone number, email address and FAX machine number.
- c. If Respondent wishes to designate an individual for all future correspondence concerning the Site, including any legal notices, please provide that individual's name, address, telephone number, email address and FAX number, and the designated individual's relationship to the Respondent.

2. Legal and Financial Information for Respondent, BW Metals, LLC

NOTE: All questions in this section refer to the time period being investigated unless otherwise specifically indicated below. EPA requests that you provide a complete response and documents for each of these questions below.

- a. If Respondent is, or was at any time, a corporation provide:
 - i. the date of incorporation;
 - ii. state of incorporation;
 - iii. the names of all officers from 2012 to the present, including their titles and dates of office;
 - iv. the names of all directors from 2012 to the present, including their titles and dates of office;
 - v. the names of all managers from 2012 to the present, including their titles and dates of office;
 - vi. the names of all shareholders owning the company's stock at any time from 2012 to the present; including the name, current or most recent address and phone number of each shareholder; and the number of shares held by each shareholder; and
 - vii. the names and addresses of all parent and subsidiary entities affiliated with the company.
- b. If Respondent has filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;
 - ii. the docket numbers of such petition;
 - iii. the date the bankruptcy petition was filed;
 - iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
 - v. a brief description of the current status of the petition.
- c. If Respondent no longer exists as the same legal entity because of dissolution provide:
 - i. a brief description of the nature and reason for dissolution;
 - ii. the date of dissolution;
 - iii. documents memorializing or indicating the dissolution of the entity;
 - iv. a statement of the net worth of the entity at the time of termination; and
 - v. a statement of how and to whom the entity's assets were distributed.
- d. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:
 - i. a brief statement describing the nature of the asset purchases or mergers;
 - ii. the titles and dates of the documents that embody the terms of such transactions;
 - iii. the identities of the seller, buyer and any other parties to such transactions; and
 - iv. copies of the documents that embody the terms of such transactions (*e.g.*, purchase agreements, merger and dissolution agreements).
- e. Identify each of Respondent's predecessors and/or successors-in-interest and provide a description of the relationship between Respondent and each of those predecessors and/or successors-in-interest.
- f. If Respondent has ever done business under any other name;
 - i. list each such name; and
 - ii. list the dates during which such name was used by the company.
- g. Provide copies of Respondent's corporate minute books from 2012 to the Present, and any related corporations.

3. Relationship with CUNI Casting

NOTE: All questions in this section refer to the period being investigated (2012 to the Present) unless otherwise indicated.

- a. Describe the nature and extent of any ownership interest that Respondent had or may have in CUNI Casting, LLC ("CUNI Casting") and when and how such ownership interest was acquired.
- b. Describe the nature of any contract(s), agreement(s) or other relationship between Respondent and CUNI Casting including the dates of any such contract(s), agreement(s) or relationship.
- c. Provide a history (e.g., payment dates, amounts received, etc.) of dividends received by Respondent from CUNI Casting.
- d. Does Respondent provide, or has Respondent ever provided, any assistance, guidance, advice or input of any nature to CUNI Casting in the preparation or formulation of CUNI Casting's business strategy, business goals, budgets, and/or forecasts? If so, explain in detail.
- e. Has Respondent ever made any loan(s) to CUNI Casting? If so, provide complete information pertaining to such loan(s), including copies of all loan documentation (i.e., loan agreements, promissory notes, guarantees, security agreements, financing statements, amortization/payment tables), and complete information pertaining to any assignment, extension, composition, and/or restructuring of such loan(s). For the purposes of this question, "loan" shall include the establishment of a line of credit for the use and/or benefit of CUNI Casting, whether or not such line of credit has ever been drawn on.
- f. Has Respondent ever transacted any business with CUNI Casting? This includes the purchase of goods or services, or the sale of goods or services. If so, provide complete information regarding the nature and extent of such transactions or business relationship.
- g. Has Respondent ever acted directly or indirectly to guarantee any loan made to CUNI Casting? If so, provide complete information regarding such arrangement, including copies of all documents pertaining to such arrangement.
- h. Was CUNI Casting required to receive Respondent's approval or concurrence when making expenditures? If so, explain in detail.

4. Relationship with BWM Metals, LLC

NOTE: All questions in this section refer to the period being investigated (2012 to the Present) unless otherwise indicated.

- a. Describe the nature and extent of any ownership interest that Respondent had or may have in BWM Metals, LLC ("BWM Metals") and when and how such ownership interest was acquired.
- b. Describe the nature of any contract(s), agreement(s) or other relationship between Respondent and BWM Metals including the dates of any such contract(s), agreement(s) or relationship.
- c. Provide a history (e.g., payment dates, amounts received, etc.) of dividends received by Respondent from BWM Metals.
- d. Does Respondent provide, or has Respondent ever provided, any assistance, guidance, advice or input of any nature to BWM Metals in the preparation or formulation of BWM Metals' business strategy, business goals, budgets, and/or forecasts? If so, explain in detail.
- e. Has Respondent ever made any loan(s) to BWM Metals? If so, provide complete information pertaining to such loan(s), including copies of all loan documentation (i.e., loan agreements, promissory notes, guarantees, security agreements, financing statements, amortization/payment tables), and complete information pertaining to any assignment, extension, composition, and/or restructuring of such loan(s). For the purposes of this question, "loan" shall include the establishment of a line of credit for the use and/or benefit of BWM Metals, whether or not such line of credit has ever been drawn on.
- f. Has Respondent ever transacted any business with BWM Metals? This includes the purchase of goods or services, or the sale of goods or services. If so, provide complete information regarding the nature and extent of such transactions or business relationship.
- g. Has Respondent ever acted directly or indirectly to guarantee any loan made to BWM Metals? If so, provide complete information regarding such arrangement, including copies of all documents pertaining to such arrangement.
- h. Was BWM Metals required to receive Respondent's approval or concurrence when making expenditures? If so, explain in detail.

5. Respondent's Operations

NOTE: All questions in this section refer to the period being investigated (2012 to the Present).

- a. State the beginning and ending dates of Respondent's activities and/or operations at the Site.

- b. Describe in detail the nature of Respondent's activities and/or operations at the Site by date.
- c. Identify all meetings and communications between Respondent and the officers, directors, managers, and/or employees of CUNI Casting regarding any operations at the Site.
- d. Identify what, if any, reports, statements or other documents the officers, directors, managers, and/or employees of Respondent wrote or received regarding any operations at the Site.
- e. Identify any officers, directors, managers or employees who participated in discussions or other communications regarding the disposal of waste materials at the Site.
- f. State whether any officers, directors or managers of Respondent approved, authorized, discussed, or had knowledge or awareness of any arrangement to dispose of wastes from, or at, the Site. Describe the nature and extent of such approval, authorization, discussion, knowledge, or awareness.
- g. Were any reports discussing waste disposal practices at the Site ever received by the officers, directors or managers of Respondent. If so, indicate (i) when such reports were received; (ii) identify the originator of such reports; (iii) identify the recipient(s) of such reports; and (iv) describe the contents of such reports. If such reports are in your possession or control, submit copies of such reports to EPA.
- h. If not already provided in response to the questions above, provide the identity of any individuals of Respondent who participated in activities conducted at the Site.
- i. If not already provided in response to the questions above, provide the identity of any individuals of Respondent who participated in discussions about Respondent's waste disposal practices at the Site.
- j. If not already provided in response to the questions above, provide the identity of any individuals of Respondent who concurrently with the Respondent exercised actual control or who held significant authority to control activities at the Site.

6. Compliance With This Request

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:
 - i. the names of all individuals consulted;

- ii. the current job title, job description, address and telephone number of each individual consulted;
- iii. the job title and job description during the period being investigated of each individual consulted;
- iv. whether each individual consulted is a past employee of Respondent;
- v. the nature of all documents reviewed;
- vi. the locations where those documents reviewed were kept prior to review; and
- vii. the location where those documents reviewed are currently kept.

7. Document Retention

- a. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
 - i. your document retention policy;
 - ii. a description of how the records were destroyed (*e.g.*, burned, archived, trashed) and the approximate date of destruction;
 - iii. a description of the type of information that would have been contained in the documents; and
 - iv. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

_____ and that the foregoing is complete, true, and correct.
Respondent

Executed on _____, 20__

Signature

Type Name

Title

INFORMATION REQUEST INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
6. Submit Documents with Labels Keyed to Question. For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within thirty (30) days of discovering such responsive information may subject you to \$57,317 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the Respondent may be subject to criminal prosecution.
8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.

9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." These separate marked sheets should be submitted to EPA by hard copy or compact disc, and not by email. Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, or if you do not assert such claim on the information, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request will be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)

12. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any

document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

EPA CONTRACTOR LIST

Updated April, 2017

CONTRACTOR

CONTRACT NUMBER

ASRC Federal Mission Services
Effective: February 15, 2017
Subcontractor: Booz Allen Hamilton

Contract # EP-W-17-011

Eisenstein Malanchuk LLP
Effective: March 1, 2013

Contract # EP-W-013-006

KGSNE JV, LLC
Effective: April 5, 2017
Subcontractor: TechLaw, Inc.

START 8(a) Contract # EP-S-11701

Industrial Economics, Inc.
Effective: 2016

Contract # EP EP-W-16-023

INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Information Request and related Enclosures:

1. The term “you” or “Respondent” shall mean the addressee of this Request (BW Metals, LLC), the addressee's officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents, and any predecessor or successor corporations or companies, and/or any subsidiaries thereof.

2. The terms “document” and “documents” shall mean any method of recording, storing, or transmitting information. “Document” shall include but not be limited to:

(a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:

1. invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
2. letter, correspondence, fax, telegram, telex, Email;
3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
4. agreement, contract, and the like;
5. log book, diary, calendar, desk pad, journal;
6. bulletin, circular, form, pamphlet, statement;
7. report, notice, analysis, notebook;
8. graph or chart; or
9. copy of any document.

(b) microfilm or other film record, photograph, or sound recording on any type of device;

(c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:

1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and

2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and

- (d) attachments to or enclosures with any document as well as any document referred to in any other document.

3. The term “identify” or “provide the identity of” means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with job title, position or business.

4. The term “identify” or “provide the identity of” means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address and telephone number; (c) legal form (e.g. corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

5. The term “identify” or “provide the identity of” means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number, if any (e.g., invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.

6. The term “material” or “materials” shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The terms “the period being investigated” and “the relevant time period” shall mean the period being investigated as specified on the first page of the Information Request Questions.

8. The terms “the Site” or “the facility” shall mean and include the property located at 75 Liberty Street and 7 Riverside Drive in Ansonia, CT, currently identified by EPA as the Liberty Street Ansonia Copper & Brass Superfund Site, which is more fully described in the enclosed Site Description.

9. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

10. The term “asset” shall mean and include but not be limited to the following: cash, commodities, personal property, collectibles, real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies,

interests in partnerships, corporations, and unincorporated companies, whether foreign or domestic, securities, patents, stocks, bonds, and other tangible as well as intangible property.

11. The term “real estate” shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

ATTACHMENT
SITE DESCRIPTION

The Liberty Street Ansonia Copper and Brass Site is located at 75 Liberty Street (Parcel ID 03300190000) and 7 Riverside Drive (Parcel ID 03500010004) in Ansonia, New Haven County, CT. The 75 Liberty Street property is 16.5 acres, and the 7 Riverside Drive property is 22.04-acres. The two properties are divided by an active rail line. The Site is bordered to the west by the Naugatuck River, to the north and east by residential and commercial properties, and to the south by industrial and commercial properties. The Site is currently inactive and formerly used for the manufacture and/or processing of copper and brass products. Several large buildings occupy the Site, including an office building with a metallurgy laboratory in the basement, the Casting Mill (Building 1), the Power House (Building 2), the Rod Mill (Building 3), the Extrusion Mill (Building 4), the Flat Wire Mill (Building 5), and the waste water treatment plant. The facility is abandoned, unguarded and accessible to trespassers. The buildings and roofs are deteriorating, and the Site no longer has heat, electricity, or water services in case of fire.

In May 2017, the Connecticut Department of Energy and Environmental Protection referred the Site to EPA's Emergency Planning and Response Branch. In July 2017, EPA conducted a Preliminary Assessment and Site Investigation and identified the following environmental hazards throughout the Site: asbestos-containing material ("ACM") on piping, equipment, or within tiles; open containers and drums of suspected used hydraulic oil from machinery; drums of unidentified liquids and/or solids; vats and pits of contaminated rainwater; large transformers that previously contained polychlorinated biphenyl ("PCB") oil; and small containers and jars of chemicals in the metallurgy laboratory. EPA collected samples of solid/sludge, aqueous liquids, ACM, suspected PCB transformer oil, and drum product throughout the numerous mill buildings.

Hazardous substances at the Site included PCBs, heavy metals, corrosive wastes, and friable asbestos, and were a potential health threat to anyone walking on, traveling by or living near the Site. EPA subsequently determined that a removal action was necessary.

From September 18, 2017 to September 24, 2018, EPA performed a time-critical removal action including but not limited to: site security as necessary; additional sampling to determine the extent of contamination; air monitoring, dust control and suppression; removed lab pack chemicals located in metallurgy laboratory; hazardous categorization of drums/containers/pits/trough contents; removed contaminated liquid/solid/sludge areas inside the buildings and staged for transportation; consolidated/over-packed and staged containers of hazardous substances; collected and consolidated accessible friable asbestos in degrading condition located inside and around the buildings; removed and disposed of any other hazardous substances; coordinated transportation and disposal of collected wastes to EPA approved disposal facilities; installed safety fencing and warning signage around all open floor pits and trenches prior to demobilization to protect trespassers from fall hazards; and repaired response-related damage.

END OF INFORMATION REQUEST
THANK YOU FOR YOUR COOPERATION

